Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-Significant Revision

Facility: **Crestwood - Willow Lake Gas Processing Plant**
Company: Crestwood New Mexico, LLC
Permit No(s).: 5142M8
Tempo/IDEA ID No.: 32575 - PRN20210001
Permit Writer: Urshula Bajracharya

Fee Tracking

Tracking	**NSR tracking entries completed:** [X] Yes [] No
	NSR tracking page attached to front cover of permit folder: [X] Yes [] No
	Paid Invoice Attached: [] Yes [X] No
	Balance Due Invoice Attached: [] Yes [X] No
	Invoice Comments: Fee paid in full

Permit Review	**Date to Enforcement:** N/A	**Date of Enforcement Reply:** N/A
	Date to Applicant: 5/27/2021	**Date of Applicant Reply:** most recent-9/17/2021
	Date to EPA: N/A	**Date of EPA Reply:** N/A
	Date to Supervisor: 05/19/2021	

1.0 Plant Process Description:

The Willow Lake facility consists of two (2) process units to recover natural gas liquids (NGL): Willow Lake 1 consists of a turbo-expander cryogenic separation system that removes a significant fraction of the C2+ compounds from the cooled gas stream, and Willow Lake 2 consists of a refrigerated Joule-Thompson (RJT) plant that also removes C2+ compounds using a combination of mechanical refrigeration and a Joule-Thompson effect. Willow Lake 1 has a maximum processing capacity of 20 MMSCFD of natural gas. Willow Lake 2 has a maximum processing capacity of 35 MMSCFD of natural gas. The two processing units have separate inlets but share two outlet residue lines.

During normal operation, the gas enters Willow Lake 1 through an inlet scrubber. The gas is then sent to a 25 MMSCFD TEG dehydration unit (Unit DEHY-803) and molecular sieve dehydrator where water is removed from the wet gas. The cryogenic separation system separates and extracts NGLs from the dry gas stream. The resulting lean residual gas stream is sent to the residue compressor and to the sales pipeline. The resulting NGL stream is sent to one 90,000-gallon bullet tank, then trucked offsite.

Gas enters Willow Lake 2 through an inlet gas separator. A combination of mechanical refrigeration and a Joule-Thompson effect separates and extracts NGLs. The resulting lean residual gas stream is sent to two residue compressors and to the sales pipeline. The resulting NGL stream is sent to three 30,000-gallon bullet tanks, then trucked offsite.

Willow Lake 1 and Willow Lake 2 (in addition to operating as two processing units) may also operate as a compressor station (i.e., without processing). Compressor station capability (after this modification) will include eight compressor engines (units C-1110 though C-1180), four 400-bbl condensates/produced water storage tanks (WLCS-TK2301 through WLCS-TK2303) and one TEG dehydrator (DEHY-1505).

2.0 Description of this Modification:

The modifications in this permit are as follows:

- Add three (3) natural gas-fired Caterpillar G3606 4SLB compressor engines rated at 1875 hp and associated compressors (Units C-1160 through C-1180);
- Add one (1) 400 bbl produced water/condensate tank associated with the compressor station (Unit WLCS-TK2304);
- Add one (1) Triethylene Glycol dehydration unit rated at 80 MMSCFD (Unit DEHY-1505) and one (1) associated 1.5 MMBtu/hr reboiler (Unit HTR-1505);
- A thorough review of emission calculations was completed for all existing units and pertinent updates were made as applicable. These include the following:
    - Decrease in formaldehyde control efficiency for existing compressor engines based on updated catalyst guarantees (Units C-2300 and C-2400, C-1110 through C-1150);
    - Revising WL1-FL calculations to account for flash tank vapors from the dehydration units (Units DEHY-803, DEHY-804, DEHY-805, and DEHY-1505) in the event flash gas is not burned as fuel, and VRU is out of service for maintenance;
    - Revising WL Compressor Station tank and atmospheric truck loading calculations based on estimated increases in liquid throughputs (Units WLCS-TK2301 through WLCS-TK2303, and ATM LOAD);
    - Updating fugitive component counts and separating fugitive components based on federal regulatory applicability (Units FUG-1 and FUG-2) and estimated component increases;
    - Updating unit numbering from ENG-1 through ENG-5 to C-1110 through C-1150;
    - Updating control device numbering on engines from C-1 through C-9 to Oxcat-1100, NSCR-1200, NSCR-2300, NSCR-2400 and OxCat-1110 through OxCat-1150.

3.0 Source Determination:

1. The emission sources evaluated include the entire facility of Willow Lake Gas Processing Plant.

2. Single Source Analysis:

A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? **Yes**

B. Common Ownership or Control: Are the facilities under common ownership or control? **Yes**

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? **Yes**

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? **Yes**

4.0 **PSD Applicability:**

A. The source, as determined in 3.0 above, is **a synthetic minor source before and after this modification.**

5.0 **History (In descending chronological order, showing NSR and TV):** *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
5142-M8*	02/11/2022 (Signed after Final Order for Hearing)	NSR-Significant Revision	The action is to add three (3) compressor engines, one (1) produced water/condensate tank, one (1) TEG Glycol dehydrator, review of emissions for seven (7) engines, for the flares, the tanks and update fugitives 1 and 2; and finally update unit numbers for several engines and control device numbering for the engines; addition of new VRU (WLCS-VRU); update to through put for tanks and truck load.
5142-M7	12/24/2020	Regular- NSR	Conversion of the facility from GCP-4 to NSR. Addition of five (5) compressor engines, three (3) tanks (produced water and condensate), one (1) flare, one (1) reboiler and one (1) Pigging. Modification of one (1) existing flare, two (2) Dehy, one (1) reboiler and fugitives.
5142-M6	02/07/2018	Revision to Form C	Addition of one 50 MMscf/ day triethylene glycol (TEG) dehydrator, one 1.5 MM BTU /hr heater and one 210 bbl produced water /condensate tank. Updating facility-wide fugitive emissions, control efficiency of the dehydration units 01 and 02 and the Crestwood New Mexico Pipeline LLC company address.
5142-M5	9/28/2016	Revision to Form C	The facility is being modified by routing upset venting of residue gas to the existing flare.
5142-M4	2/2/2016	Revision to Form C	>Adding three pressurized NGL storage tanks; > Adding one Joule-Thomson (J-T) skid; > Removing Caterpillar G399; > Adding two Waukesha VHP L7044 engines; > Adding a flare (unit FL-1); > Adding a hot oil heater (unit H-HTR); > Adding a 210-bbl slop tank (unit S-TK); > Removing amine system (units Amine-1 and HTR-AMINE).

5.0 **History (In descending chronological order, showing NSR and TV):** *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
5142-M3	Withdrawn	NSR- Regular New	The applicant withdrew this permit application because the facility received commercial power supply before the permit was issued and no longer needed the generator that was going to be installed with this permitting action.
5142-M2	11/2/2015	Revision to Form C	This revision includes: > Updating the glycol dehydrator dry gas flow rate to 30 MMscf/day on units D1 and D2 > Update the naming on unit Reboil-D1 to HTR DEHY > Update the naming on unit Htr-1 to MS Heater > Remove reboil units--Reboil-DD and Reboil-D2 > Replace PIG (SSM) with unit SSM/M to account for startup, shutdown, maintenance, and malfunction
5142-M1	9/12/2014	Revision to Form C	The changes to the facility include removal of the CAT 3508B LE, addition of the CAT G399 generator, regeneration heater increase to 2 MMbtu, one large NGL tank in place of three smaller tanks, and a change in the condensate loading rate to 300 bbls/week.
5142	8/27/2013	GCP4 – New	The facility is a natural gas processing plant. The maximum processing capacity of the natural gas is 30 MMscf/day with a maximum H_2S inlet concentration of 1 ppmv and will remove approximately 3% CO_2.

6.0 **Public Response/Concerns:** On April 16, 2021 the AQB received comments and a hearing request for this permit application from WildEarth Guardians.

7.0 **Compliance Testing:**

Unit No.	Compliance Test	Test Dates
C-1100	Tested in accordance with EPA test methods for NOX and CO as required by GCP-4-VIII(2)(c). VOC emissions are tested every three (3) years or every 8,760 hours pursuant to NSPS JJJJ.	1/29/18
		4/27/18
		7/25/18
		10/26/18
		1/18/19
		4/8/19
		7/8/19
		10/28/19
		1/24/2020
		4/21/2020

		7/1/2020
C-1200	Tested in accordance with EPA test methods for NOX and CO as required by GCP-4-VIII(2)(c). VOC emissions are tested every three (3) years or every 8,760 hours pursuant to NSPS JJJJ.	1/31/18
		4/27/18
		7/25/18
		10/26/18
		1/18/19
		4/8/19
		7/8/19
		10/28/19
		1/24/2020
		4/22/2020
		7/1/2020
C-2300	Tested in accordance with EPA test methods for NOX and CO as required by GCP-4-VIII(2)(c). VOC emissions are tested every three (3) years or every 8,760 hours pursuant to NSPS JJJJ.	1/26/18
		4/3/18
		7/30/18
		10/26/18
		1/18/19
		4/9/19
		7/22/19
		10/28/19
		1/24/2020
		4/21/2020
		7/1/2020
C-2400	Tested in accordance with EPA test methods for NOX and CO as required by GCP-4-VIII(2)(c). VOC emissions are tested every three (3) years or every 8,760 hours pursuant to NSPS JJJJ.	1/26/18
		4/3/18
		7/30/18
		10/26/18
		1/18/19
		4/9/19
		7/22/19
		10/28/19
		1/27/2020
		4/29/2020
		7/1/2020

8.0 <u>Startup and Shutdown:</u>

A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? Yes
B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
D. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? Yes

9.0 Compliance and Enforcement Status:

Request for Verification of compliance was sent to Allan Morris on February 24, 2021. A response on compliance verification was still pending on May 19, 2021, will be determined soon.

10.0 Modeling:

The modeling report from Angela Raso (05/14/2021) states: This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO, NO2, PM10, PM2.5, and SO2; NMAAQS for CO, H2S, NO2, and SO2; and Class I and Class II PSD increments for NO2, PM10, PM2.5, and SO2.

11.0 State Regulatory Analysis (NMAC/AQCR):

STATE REGU-LATIONS Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes	Entire Facility	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.
2.7	Excess Emissions	Yes	Entire Facility	Applies to all facilities' sources
2.61	Smoke and Visible Emissions	Yes	C-1100, C-1200, C-2300, C-2400, C- 1110 to C1180, HTR-802 to HTR-805, HTR-730, HTR-1505, WL1-FL, WL2-FL	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC).
2.70	Operating Permits	Yes	Entire Facility	The source will be a Title V Major Source as defined at 20.2.70.7 NMAC after this permit is issued.

STATE REGU-LATIONS Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes	Entire Facility	Applicable to all facilities that require a permit. PER > 10 tpy for a regulated air contaminant.
2.75	Construction Permit Fees	Yes	Entire Facility	This facility is subject to 20.2.72 NMAC
2.77	New Source Performance Standards	Yes	See Sources subject to 40 CFR 60	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60.
2.78	Emissions Standards for HAPs	No	See Sources subject to 40 CFR 61	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61.
2.79	Permits Nonattainment Areas	No		This facility is not located in, nor does it affect, a nonattainment area. Link to Non-attainment Link areas
2.82	MACT Standards for Source Categories of HAPs	Yes	See sources subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63.

12.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	C-1100, C-1200, C-2300 C-2400, C-1110 to C-1180, FUG-1, FUG-2	Applies if any other subpart applies.
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural	No		Affected Facility with Leaks of VOC from Onshore Gas Plants. Any affected facility under paragraph (a) of this section that commences construction, reconstruction,

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Gas Processing Plants			or modification after January 20, 1984, is subject to the requirements of this subpart. The group of all equipment (each pump, pressure relief device, open-ended valve or line, valve, compressor, and flange or other connector that is in VOC service or in wet gas service, and any device or system required by this subpart) except compressors (defined in § 60.631) within a process unit is an affected facility. A compressor station, dehydration unit, sweetening unit, underground storage tank, field gas gathering system, or liquefied natural gas unit is covered by this subpart if it is located at an onshore natural gas processing plant. If the unit is not located at the plant site, then it is exempt from the provisions of this subpart. Construction for the facility was done after August 23, 2011.
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	Yes	C-1100, C-1200, C-2300 C-2400, C-1110 to C-1180	The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of section 60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Link to regulation – read more
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	Yes	FUG-1 (all process unit equipment Cryo and Mol Sieve at Willow Lake 1), and Compressors for C-1100 and C-1200	The rule applies to "affected" facilities that are constructed, modified, or reconstructed after Aug 23, 2011 (40 CFR 60.5365): gas wells, including fractured and hydraulically refractured wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, certain equipment at natural gas processing plants, sweetening units at natural gas processing plants, and storage vessels. If there is a standard or other

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				requirement, then the facility is an "affected facility." Currently there are standards for: gas wells (60.5375); centrifugal compressors (60.5380); reciprocating compressors (60.5385): controllers (60.5390); storage vessels (60.5395); equipment leaks (60.5400); sweetening units (60.5405). The compressors associated with Units C-1100 and C-1200 were constructed after 8/23/2011 but prior to September 18, 2015 and are subject to subpart OOOO. The process unit fugitive components at Willow Lake 1 (as a gas plant) that are processing NGL such as the Cryogenic unit and Molecular Sieve are subject to NSPS OOOO based on applicable construction date. See NSPS OOOOa below for process unit equipment at Willow Lake 2, and for additional compressor unit applicability. The storage vessels at this facility (TK-601 to TK-603), taking controls into consideration, with enforceable limits, will each emit less than 6 tpy of VOC and are therefore, not subject to this regulation.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Yes	Compressors for engines: C-2300 C-2400, C-1110 to C-1180, FUG-2 (is all process equipment including RJT at Willow Lake 2)	The compressors associated with Units C-2300, C-2400 and units C-1110 to C-1180 will be or were constructed or modified after September 18, 2015 and are subject to subpart OOOOa. The collection of fugitive components at Willow Lake 1 will remain subject to NSPS OOOO as Willow Lake 1 was constructed within the applicability dates of OOOO. The newer gas processing equipment, refrigerated Joule-Thompson unit (RJT) and associated NGL equipment at Willow Lake 2 will be identified as FUG-2 and subject to NSPS OOOOa. The storage vessels at this facility (TK-

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				8101, TK-8102, and TK-2301 to TK-2304), taking controls into consideration, with enforceable limits, will each emit less than 6 tpy of VOC and are therefore, not subject to this regulation.
NESHAP Subpart A (40 CFR 61)	General Provisions	No	See sources subject to a Subpart in 40 CFR 61	Applies if any other subpart applies.
MACT Subpart A (40 CFR 63)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 63	Applies if any other subpart applies.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY-803, DEHY-804, DEHY-805, DEHY-1505	AREA SOURCE (Minor for HAPs): The facility contains affected sources (TEG glycol dehydrators, 63.760(b)(2)). However, as actual benzene emissions are less than one ton per year (63.764(e)(ii)), the dehydrators are exempt, and the records of the determination must be maintained as required in §63.774(d)(1).
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	C-1100, C-1200, C-2300, C-2400, C-1110 to C-1180	See 63.6580 and EPA Region 1's Reciprocating Internal Combustion Guidance website. A facility is subject to this subpart if they own or operate a stationary RICE at an area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.
40 CFR 64	Compliance Assurance Monitoring	Potentially	Dehy 803 Dehy 805 Dehy 1505	Engine units C-1200, C-2300, and C-2400 are controlled and have uncontrolled emissions greater than 100 tpy for NOx and CO and the dehys have uncontrolled VOC emissions greater than 100 tpy. However, the engines are subject to 40 CFR 60 Subpart JJJJ, therefore exempt from CAM. The applicant asserts that the reboiler and condenser for the dehys are not controls (but part of process); this

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				rationale will be considered during the Title V application review.

13.0 Exempt and/or Insignificant Equipment that do not require monitoring:

Unit Number	Source Description	Make	Model No. / Serial No.	Max Capacity / Capacity Units	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) / Insignificant Activity citation (e.g. IA List Item #1. a)	Date of Manufacture /Reconstruction[2] / Date of Installation /Construction[2]
NGL-1	NGL Pressurized Bullet Tank	TBD	TBD	90,000	20.2.72.202.B(5) NMAC	N/A
			TBD	gallons	N/A	N/A
NGL-2	NGL Pressurized Bullet Tank	TBD	TBD	60,000	20.2.72.202.B(5) NMAC	N/A
			TBD	gallons	N/A	N/A
NGL-3	NGL Pressurized Bullet Tank	TBD	TBD	60,000	20.2.72.202.B(5) NMAC	N/A
			TBD	gallons	N/A	N/A
NGL-4	NGL Pressurized Bullet Tank	TBD	TBD	60,000	20.2.72.202.B(5) NMAC	N/A
			TBD	gallons	N/A	N/A
AST-4	Methanol	Unknown	N/A	500	20.2.72.202.B(5) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-5	Triethylene Glycol	Unknown	N/A	520	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-7	Lube Oil	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-8	Antifreeze	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-9	Lube Oil	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-10	Antifreeze	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-11	Used Oil	Unknown	N/A	540	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A

Unit Number	Source Description	Make	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction[2]
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item	Date of Installation
AST-12	Triethylene Glycol	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-13	Emulsion Breaker	Unknown	N/A	130	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-14	Soap	Unknown	N/A	300	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-15	Degreaser	Unknown	N/A	300	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-16	Compressor Oil	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-17	Compressor Oil	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-2-2	Engine Oil	Unknown	N/A	1000	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-3-2	Antifreeze	Unknown	N/A	1000	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-4-2	Ethylene Glycol	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-5-2	Methanol	Unknown	N/A	60	20.2.72.202.B(5) NMAC	N/A
			N/A	bbl	N/A	N/A
AST-6-2	Waste Oil	Unknown	N/A	500	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
AST-8-2	Compressor Oil	Unknown	N/A	1000	20.2.72.202.B(2) NMAC	N/A
			N/A	gallons	N/A	N/A
HAUL	Unpaved Haul Road Emissions	Unknown	N/A	N/A	20.2.72.202.B(5) NMAC	N/A
			N/A	N/A	N/A	N/A

14.0 New/Modified/Unique Conditions (Format: Condition#: Explanation):

A. New VRU added to Table 104.A and Table 105.A.
B. Table 106.A VOC emissions revised. Footnote for "<" revised.
C. Added new engines units C1160 to C1180 to Permit conditions A111.A, A201.A, A201.B,

A201.C, A201.D, A201.E, A201.G and A201.I.

D. Compressors: Revised to add NSPS OOOO for compressors C-1100 and C-1200. All of the other compressors are subject to OOOOa.
E. Added new reboiler unit HTR-1505 to permit conditions A111.A and A202.C.
F. Added new dehydrator unit DEHY-1505 to permit conditions A202.A, A202.B and A202.F
G. Added new condition A202.E Dehydrator and Control Devices (Vapor Recovery Unit (Unit WL1-VRU) and Flare (Unit WL1-FL)) for DEHY-803 to DEHY-805 and DEHY 1505.
H. Added new tank unit WLCS-TK2304 to permit conditions and Section A203 conditions revised (added new A203.C condition and renumbered those following).

15.0 Permit specialist's notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.

A. The controls for dehydrators have changed since the last permit 5142M7.
B. The VRUs at the facility has rotary screw compressors which are not subject to NSPS OOOO or NSPS OOOOa.
C. The facility is regulated for TAPs under 20.2.72.401.F and are below the threshold limit as indicated by Table 2-I of the permit application.
D. The facility has added a new VRU to WL1 part of the facility.